

R6 Superfund Enforcement Program Input to OSRE

September 25, 2018

Region program & management challenges and ideas to overcome

CHALLENGES

- Limited resources, complex sites with demanding PPR searches, e.g., Wilcox. Litigation support / document discovery
- Relocation to a different facility, potential for interruption during relocation
- Preparing boxes for either relocation to new building or Federal Record Center for long term storage
- Future Record Management strategy – digitizing all records/ resources
- Federal PRPs

IDEAS TO OVERCOME CHALLENGE

- OSRE is already helping with ATP, corporate and insurance analysis
 - HQs email searches for discovery
 - Additional funding when available to support enforcement activities and digitizing documents.
 - Time-to-time legal help from OSRE on large complex cases, e.g.
 - ❖ Denise Ergener was a great help for San Jacinto site,
 - ❖ Her presence and assistance during San Mateo Creek Basin PRP meeting was much appreciated.
 - Brian Motto is already helping the Region with multiple complex issues, e.g.
 - ❖ Griggs & Walnut, he coordinated briefing in an expedited manner to AA
 - ❖ His participation in monthly call with DOJ
 - Insurance Training /Special account training/ PRP Search Training
 - FACT Tool and transfer of best practices from other regions
 - Resources for digitizing documents that will make responding to FOIAs and litigation less time consuming and costly (searches and storage).
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- Succession planning / preparing how-to SOPs to avoid single failures and preparing new staff for a jump start
 - ❖ ELMS / Lean Projects that focus on preserving institutional knowledge
 - ❖ Specifically, focusing on critical positions

REGIONAL ACCOMPLISHMENT STORIES

- San Jacinto Site
 - ❖ RD AOC work \$4.3M and RA over \$100M.
 - ❖ RD AOC was completed in 6 months although the PRPs previously been issued a UAO and were expected to be uncooperative.

- GNL at the time proposal for new Sites saving at least 6 months in negotiations
 - ❖ SBA Shipyard
 - ❖ San Mateo Creek Basin (before NPL proposal)
 - ❖ US Oil – preparing an extension to the order to address hurricane preparedness
 - ❖ CES Environmental Houston – will likely recover 100% of past costs.
Worked with PRP group to identify additional PRPs